

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC)  ECF Case
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**This document relates to:**

**Continental Casualty Co., et al. v. Al Qaeda, et al.**  
**(1:04-cv-5970) (RCC)**

**New York Marine and General Ins. Co. v. Al  
Qaida, et al. (1:04-cv-6105) (RCC)**

**DMI ADMINISTRATIVE SERVICES S.A.'s STATEMENT REGARDING DELAYED  
FILING OF MOTION TO DISMISS**

On May 6, 7 and 8, 2005, Defendant DMI Administrative Services S.A., by their attorneys Sheppard Mullin Richter & Hampton LLP, attempted to file its consolidated Notice of Motion to Dismiss in the above referenced actions seven (7) times without success. Each time Defendant received the same "Internal Error" message. See attached print copies of error messages. Defendant has filed the consolidated Notice of Motion, together with its Memorandum in Support, as of the date hereof.

Dated: New York, New York  
May 9, 2005

Respectfully submitted,  
SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: /s/  
Timothy J. McCarthy (TM-2118)

30 Rockefeller Plaza, 24<sup>th</sup> Floor  
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*Attorneys for Defendant  
DMI Administrative Services S.A.*

Eric S. O'Connor  
Of Counsel

Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-23322-62590.2236725893:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimctr,cs\_closed,cs\_county,cs\_d  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(33906 180 /tmp/222305371044887 )

An Internal Error has occurred the error code 70. -1

Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-23685-45016.0458007534:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimcntr,cs\_closed,cs\_c  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(28379 180 /tmp/965507152631207 )

An Internal Error has occurred the error code 70. -1

Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-24412-40768.2305943449:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimentr,cs\_closed,cs\_county,cs\_d  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(32554 180 /tmp/442902908056367 )

An Internal Error has occurred the error code 70. -1

## Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-24841-103092.093629838:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimctr,cs\_closed,cs\_county,cs\_d  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(32589 180 /tmp/111856016367807 )

An Internal Error has occurred the error code 70. -1

## Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-27939-51300.5163015028:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimentr,cs\_closed,cs\_county,cs\_d  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(32467 180 /tmp/627615111229016 )

An Internal Error has occurred the error code 70. -1

Syntax error - 781102-9104-71375.5186714929:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimentr,cs\_closed,cs\_c  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(43689 183 /tmp/122833818283974 )

An Internal Error has occurred the error code 70. -1

## Motions

1:03-md-01570-RCC In Re: Terrorist Attacks on September 11, 2001

Syntax error - 781102-20112-109095.626893984:unload  
("cs\_appeal,cs\_bondinfo,cs\_case\_number,cs\_caseid,cs\_chapter,cs\_cjra\_stat,cs\_claimentr,cs\_closed,cs\_county,cs\_d  
(cs\_caseid =  
Transaction aborted.

An Internal Error has occurred the error code 71. - 1 (1 )-(17144 183 /tmp/877893798863482 )

An Internal Error has occurred the error code 70. -1